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August 31, 2023

VIA ECF

The Honorable Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Hernandez v. Happy Street LLC et al*
Case No.: 1:22-cv-06918-DG-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents plaintiff Aaron Hernandez (the “Plaintiff”) in the above-referenced matter.

Pursuant to the directives in Your Honor’s July 20, 2023 Status Report Order this letter respectfully serves to provide the Court with a status update in the above-referenced action.

Simultaneously herewith, the undersigned has filed an application for a clerk’s certificate of default, in anticipation of a motion for default, as against Defendants Happy Street LLC, Inc. and Happy Street Too LLC (together, the Corporate Defendants”), and Slobodan Radivojevic a/k/a Bob Radivojevic (the “Individual Defendant”, and collectively with the Corporate Defendants, the “Defendants”).

Following the entry of a clerk’s certificate of default, Plaintiff intends to file a motion for default judgment, in the event of Defendants’ continued non-appearance.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel